

Keenan, J

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

In re MANULIFE FINANCIAL CORP.  
SECURITIES LITIGATION

x : Master File No. 1:09-cv-06185-JFK

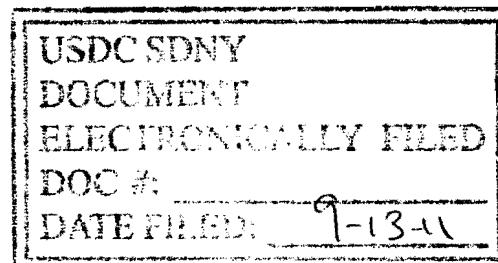
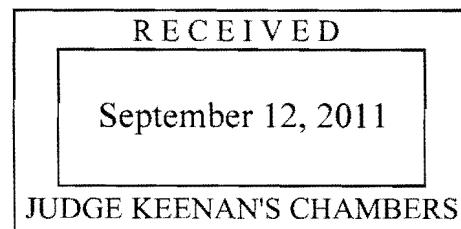
: CLASS ACTION

This Document Relates To:

: STIPULATION AND [PROPOSED]  
SCHEDULING ORDER

ALL ACTIONS.

x



WHEREAS, on May 23, 2011, this Court entered an Opinion and Order (the "Opinion") granting Defendants' motion to dismiss and granting Lead Plaintiffs leave to file a second amended complaint within sixty (60) days from the date the Opinion was entered on the docket; and providing Defendants forty-five (45) days after service of the second amended complaint to answer or respond;

WHEREAS, on July 22, 2011, Lead Plaintiffs filed their Second Amended Complaint (the "Second Complaint");

WHEREAS, on September 2, 2011, Defendants served Lead Plaintiffs with a motion to dismiss the Second Complaint;

WHEREAS, the Opinion did not provide an extended briefing schedule for Lead Plaintiffs and Defendants to serve their respective opposition and reply briefs; and

WHEREAS, the parties have conferred and agreed upon the following schedule: Lead Plaintiffs will serve their opposition to the motion to dismiss on or before October 17, 2011; and Defendants will serve their reply on or before November 16, 2011;

IT IS HEREBY STIPULATED by and between the undersigned counsel for the parties, subject to the approval of the Court, as follows:

1. Lead Plaintiffs shall serve any opposition to Defendants' motion to dismiss the Second Complaint on or before October 17, 2011; and
2. Defendants shall serve any reply to Lead Plaintiffs' opposition to Defendants' motion to dismiss on or before November 16, 2011.

DATED: September 9, 2011

ROBBINS GELLER RUDMAN & DOWD LLP  
SAMUEL H. RUDMAN  
DAVID A. ROSENFELD  
ERIN W. BOARDMAN



DAVID A. ROSENFELD

58 South Service Road, Suite 200  
Melville, NY 11747  
Telephone: 631/367-7100  
631/367-1173 (fax)  
srudman@rgrdlaw.com  
drosenfeld@rgrdlaw.com  
eboardman@rgrdlaw.com

DATED: September 9, 2011

*Lead Counsel for Plaintiffs*

DEBEVOISE & PLIMPTON, LLP  
EDWIN G. SCHALLERT  
GARY W. KUBEK  
STUART NAIFEH  
PETER J. KIM



GARY W. KUBEK

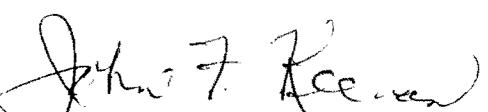
919 Third Avenue  
New York, NY 10022  
Telephone: 212/909-6000  
212/909-6836 (fax)  
egschall@debevoise.com  
gwkubek@debevoise.com  
snaifeh@debevoise.com  
pjkim@debevoise.com

DEBEVOISE & PLIMPTON, LLP  
SCOTT N. AUBY  
555 13th Street NW, Suite 1100E  
Washington, DC 20004  
Telephone: 202/383-8000  
202/383-8118 (fax)  
snauby@debevoise.com

*Attorneys for Defendants*

IT IS SO ORDERED.

DATED: New York, N.Y.  
September 13, 2011



THE HONORABLE JOHN F. KEENAN  
UNITED STATES DISTRICT JUDGE